

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

RAYMOND YEE	)	
	)	
	)	Case No. 07-C-7150
Plaintiff,	)	
	)	
v.	)	Magistrate Judge Schenkier
	)	
UBS O'CONNOR, LLC and UBS	)	
GLOBAL ASSET MANAGEMENT,	)	
	)	
Defendants.	)	

**PLAINTIFF'S UNOPPOSED MOTIONS TO (1) AMEND COMPLAINT; (2) EXTEND  
THE DISCOVERY SCHEDULE; (3) SUBSTITUTE APPEARANCE OF COUNSEL**

Plaintiff Raymond Yee, by counsel, files the attached unopposed motions to (1) amend the complaint; (2) extend the discovery schedule; and (3) substitute appearance of counsel.

1. **Motion to amend** – Yee moves for leave to amend the complaint to correct the Prayer for Relief, adding reinstatement and interest (proposed amended complaint, Ex. A):

“A. Upon the trial of this case by a jury, award plaintiff his actual losses and reinstatement;

“B. Award plaintiff liquidated damages pursuant to 29 U.S.C. § 626(b);

“C. Award back pay and/or front pay as appropriate, with pre- and post-judgment interest; . . . .”

2. **Discovery schedule** – The Court on April 29, 2008 entered the following schedule: “Rule 26(a)(1) disclosure are to be served by 5/14/08. On subjects for which the parties have burden of proof, the parties shall disclose experts and submit Rule 26(a)(2) reports by 10/3/08. The parties shall disclose responsive experts and submit Rule 26(a)(2) reports by 11/3/08. The depositions of all experts are to be completed by 12/3/08.” The parties timely

exchanged their Rule 26(a)(1) disclosures and have exchanged documents. Moreover, they are currently scheduling fact-witness depositions for October and November 2008. Nevertheless, owing to the large volume of responsive documents and electronically-stored information possessed by UBS, reasonably complete discovery was not possible before the end of August 2008. The parties are engaged in a meet-and-confer process about this discovery. To allow time to process this sizable production, Yee requests that the dates be reset by approximately 90 days: identify experts/submit Rule 26(a)(2) reports, **1/5/09**; responsive experts/Rule 26(a)(2) reports by **2/5/09**; depositions of all experts are to be completed by **3/5/09**. Defendants do not oppose.

3. **Motion to Substitute Appearance** – Associate Karen Sheley left the law firm representing Mr. Yee. A new attorney, Hina Sodha, now works for the firm instead. Plaintiff requests that Ms. Sodha's appearance be substituted for Ms. Sheley's (appearance, Ex. B).

Dated: September 8, 2008

Respectfully submitted,

---

/s/ Paul W. Mollica

One of the attorneys for plaintiff

Paul W. Mollica  
Meites Mulder Mollica & Glink  
20 S. Clark St., #1500  
Chicago, IL 60603  
312-263-0272

**CERTIFICATE OF SERVICE**

Paul W. Mollica, an attorney, hereby certifies that a true and correct copy of the foregoing **PLAINTIFF'S UNOPPOSED MOTIONS TO (1) AMEND COMPLAINT; (2) EXTEND THE DISCOVERY SCHEDULE; (3) SUBSTITUTE APPEARANCE OF COUNSEL** was sent to the following:

David B. Ritter  
Sonya Rosenberg  
Neal Gerber & Eisenberg LLP  
Two North LaSalle Street  
Suite 2200  
Chicago, Illinois 60602

via ECF-delivery on September 8, 2008.

/s/ Paul W. Mollica  
Paul W. Mollica